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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

United States of America,

Plaintiff,

v.

Matthew Okeke, M.D.,

Defendant.

Case No. 2:23-cv-01861-JAD-BNW

**Stipulation and Order to Extend Discovery
Deadlines**

(First Request)

Pursuant to LR IA 6-1 and LR 26-3, the parties request a sixty (60) day extension of discovery deadlines, which is supported by grounds and circumstances set forth below. This is the first request for an extension of the discovery deadlines.

DISCOVERY COMPLETED

The parties have completed the following discovery:

1. Plaintiff made its initial disclosures on March 12, 2024.
2. Plaintiff served its first set of requests for production of documents, first set of interrogatories and first set of requests for admission to Plaintiff on April 25, 2024.

DISCOVERY REMAINING

The parties have been working on trying to settle this case. Plaintiff has provided an offer, and Defendant has agreed to discuss this offer with his client who is currently out of the country. Defendant will provide a response to Plaintiff's settlement offer by May 22, 2024. In light of the settlement discussions the parties agreed that it will be reasonable to

1 extend the discovery deadlines.

2 If the case does not settle Defendant will respond to Plaintiff's first set of requests for
3 admissions, requests for production, and first set of interrogatories. Expert disclosures
4 remain to be completed. Plaintiff will need to schedule the deposition of Defendant.

5 The parties reserve the right to engage in any other discovery permitted by
6 applicable rules and within the revised discovery deadlines if the court approves this
7 stipulation.

8 **WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

9 The parties are working on trying to resolve this case. The requested extension will
10 allow the parties to continue their settlement discussions, and if the case does not resolve to
11 continue the discovery process.

12 The parties' counsel conferred and agreed that a sixty (60) day extension would be
13 proper. The parties agree that neither party will be prejudiced by the proposed extension,
14 and that they may be prejudiced should the current schedule remain in place. The parties
15 agree the extension is sought in good faith.

16 **EXTENSION OF THE DISCOVERY PLAN AND SCHEDULING ORDER**

17 The following table sets forth the current deadlines and the proposed sixty (60) day
18 extension of discovery deadlines that are the subject of this stipulated request:

19 SCHEDULED EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
20 Initial Expert Disclosure	May 30, 2024	July 29, 2024
21 Rebuttal Expert Report(s)	July 1, 2024	August 30, 2024
22 Discovery Cutoff	July 29, 2024	September 27, 2024
23 Dispositive Motions	August 28, 2024	October 28, 2024
24 Proposed Joint Pretrial Order	September 27, 2024	November 26, 2024¹

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28 ¹ However, if dispositive motions were to be filed, the deadline for the Proposed Joint Pretrial Order would be deferred until 30 days after the Court rules on the dispositive motions.

1 This request for an extension of time is not sought for any improper purpose
2 including delay. This is the first request for an extension of discovery deadlines in this
3 matter.

4 Respectfully submitted this 16th day of May 2024.

5 LAW OFFICES OF LIBO
6 AGWARA, LTD

JASON M. FRIERSON
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8 /s/ Liborius Agwara
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13 **IT IS SO ORDERED:**

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UNITED STATES MAGISTRATE JUDGE

15 **DATED:** 5/20/2024
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